

**SIDLEY**SIDLEY AUSTIN LLP  
ONE SOUTH DEARBORN STREET  
CHICAGO, ILLINOIS 60603  
+1 312 853-7000  
+1 312 853 7036 FAX+1 312 853 2174  
DAVID.HOFFMAN@SIDLEY.COM

July 18, 2025

**VIA ECF**

The Honorable Michael A. Hammer  
U.S. District Court for the District of New Jersey  
Martin Luther King Building &  
U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

Re: *In re American Medical Collection Agency, Inc. Customer Data Security Breach  
Litigation*, Case No. 19-md-02904(JKS)(MAH)

Dear Magistrate Judge Hammer:

We write on behalf of all Parties to respectfully request an extension of all upcoming deadlines pertaining to the filing of documents relating to Plaintiffs' motions for class certification.

Consistent with the Joint Stipulation and Order Regarding Withdrawal of Plaintiffs' Expert Designation of Gary D. Olsen (ECF Doc. 769), the Parties met and conferred and have agreed upon an updated schedule consistent with the interval sequencing set forth in the previous Amended Scheduling Order (ECF Doc. 746). Enclosed please find the agreed proposed amended scheduling order, which the Parties respectfully request that the Court enter.

We thank the Court for its attention to this matter.

Sincerely,

/s/ James E. Cecchi

James E. Cecchi  
**CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO**  
*Lead Counsel for Plaintiffs*

/s/ David H. Hoffman

David H. Hoffman  
**SIDLEY AUSTIN LLP**  
*Counsel for Defendant Quest Diagnostics  
Incorporated*

# SIDLEY

July 18, 2025

Page 2

*/s/ Donald Houser*

---

Donald Houser

**ALSTON & BIRD LLP**

*Counsel for Defendant Optum360, LLC*

*/s/ Allison Holt Ryan*

---

Allison Holt Ryan

**HOGAN LOVELLS US LLP**

*Counsel for Defendant Laboratory*

*Corporation of America Holdings*

*/s/ Bradley J. Bartolomeo*

---

Bradley J. Bartolomeo

**LEWIS BRISBOIS BISGAARD & SMITH  
LLP**

*Counsel for Defendants Sonic Healthcare USA,*

*Clinical Pathology Laboratories, Inc., Aurora*

*Diagnostics LLC, and Austin Pathology*

*Associates*